

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)**

IN RE: * *

JEF DAN PROPERTIES, LLC * **Case No.: 25-12364-NVA**

Debtor * **Chapter 11**

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**RESPONSE TO MOTION FOR
RELIEF FROM AUTOMATIC STAY**

Jefdan Properties LLC, the Debtor, by its attorney, Robert N. Grossbart, in Response to Motion For Relief from Automatic Stay, respectfully represents this response to the Honorable Court:

1. This chapter 11 was filed at the eleven-hour to prevent the Debtor's sole asset, a commercial rental property located at 2427 Callow Ave. Baltimore, Md 21217 (the "property") from being foreclosed. This property is currently non-income producing because the sole member, Beatrice Derefaka, has been unable to obtain two remaining certificates from the City of Baltimore due to an inability to even schedule a city inspector to visit the property. The Debtor has been trying to schedule these inspections prior to the date of its filing on March 19, 2025.

2. The Debtor has procured from Ameriland Capital LLC ("Ameriland") a loan commitment subject to their Guidelines and Policies, dated June 24, 2025, of one million three hundred and fifty thousand (\$1,350,000.00). Attached is a copy of the loan commitment **exhibit "A"**.

3. Washington Capital Partners as Servicer for the US Bank National Association as Trustee of HOF Grantor Trust (“Washington”) filed senior secured Proof of Claim #1 (Claim #1) on June 6, 2025. Their Claim reflects an outstanding balance is \$786,164.31. Attached is a copy of Claim #1 **exhibit “B”**.

4. WCP Fund I LLC as Servicer for the SN NU, LLC (“WCP”) filed junior secured Proof of Claim #2 on June 6, 2025. Their Claim reflects an outstanding balance is \$105,846.84. Attached is a copy of Claim #2 **exhibit “C”**.

5. Although the Debtor does not have an appraisal, Debtor’s counsel asserts based on Ameriland’s loan commitment that the property has at least a fair market value of \$1,350.000 and by extension the property has equity based on the two Proofs of Claim’s delta of \$214,121. These factors reveal that Washington has adequate protection pursuant Bankruptcy Code Section 362 (d) (1). For that sole reason their motion for relief should be denied.

WHEREFORE, the Debtor/Respondent respectfully requests this Honorable Court that:

- A. The Movant’s Motion be denied; and
- B. This Court grants such other and further relief as the nature of this cause may require.

/s/ Robert N. Grossbart, Esquire
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CERTIFICATE OF MAILING

I HEREBY CERTIFY that on Wednesday, July 02, 2025, copies of the foregoing were mailed, postage prepaid/, to the Debtor/Respondent; The Office of the U.S. Trustee, 101 W. Lombard Street, 2nd Floor, Baltimore, MD 21201; and Gerard R. Vetter, United States Dept. of Justice, Chapter 11 Trustee, 101 W. Lombard Street, Baltimore, MD 21201, Matthew W. Cheney, Acting US Trustee for Region Four, 101 W. Lombard Street, Baltimore, MD 21201 and Maurice "Mac" VerStandig, Esq. 9812 Falls Road, #114-160, Potomac, Maryland 20854

/s/ Robert N. Grossbart
Robert N. Grossbart, Esquire